

JOYCE C. LONDON, P.C.
ATTORNEY AT LAW
59 MAIDEN LANE, 6TH FLOOR
NEW YORK, NY 10038

Tel: 212 964-3700
Email: jlondonlaw@aol.com

Fax: 212 566-7501

FILED
IN CLERK'S OFFICE
US DISTRICT COURT E.D.N.Y.

August 23, 2016

By ECF and By Email

Hon. Carol B. Amon
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

★ **AUG 24 2016** ★

BROOKLYN OFFICE

Re: United States v. Jian Guo Cheng,
16 Cr 272 (CBA)

Dear Judge Amon:

This letter is to request that the conditions of defendant Jian Guo Cheng's bail bond be temporarily modified to permit him to be absent from his residence on two occasions for the purpose of being able to spend time with his two sons aged nine and ten before they go back to school after Labor Day. He has otherwise been unable to spend any time with them since the inception of the instant charges as the boys reside in Manhattan with their mother in who is ill and unable to bring them to Brooklyn to visit their father. The two occasions are as follows:

(I) On Saturday, August 27, 2016, Mr. Cheng would like to be absent from his home from 11:00 am to 8:00 pm in order to pick up his sons in Chinatown, Manhattan, take them to Coney Island for the afternoon, give them dinner, return them home to Chinatown and travel back to his residence in Brooklyn; and

(ii) On Saturday, September 3, 2016, he would like to be absent from his home from 12:00 noon to 8:00 pm in order to pick up his sons in Chinatown, Manhattan and take them to a swimming pool in Sunset Park, Brooklyn, give them dinner, return them home to Manhattan and then travel back to his residence in Brooklyn.

On June 6, 2016, Magistrate Judge Pollack granted bail to Mr. Cheng on the following conditions: a \$100,000 bail bond co-signed by 5 suretors with home detention including location monitoring. To date, he is in compliance with his bail conditions.

I have discussed this application with both Assistant United States Attorney Nadia Moore and Pretrial Services Officer Michael Ilaria of the Location Monitoring Unit. Officer Ilaria has objected to the application on policy grounds as it is for a social purpose. Assistant United States Attorney Nadia Moore is supportive of Pre-Trial Services' position.

Honorable Carol B. Amon

August 23, 2016

Accordingly, notwithstanding the objections by Pre-Trial Services and the government, it is respectfully requested that Mr Cheng's bail bond be temporarily modified to permit him to spend the last two Saturdays of his sons' summer recess with them as set forth above before they go back to school again.

Very truly yours,

/s/

Joyce C. London

cc.: AUSA Nadia Moore (By Email)
PTSO Michael Ilaria (EM Unit) (By Email)